



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 6**

1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Mr/Mrs. ????, Director **Kelly or Amy or Scott**  
Land Protection Division  
Oklahoma Department of Environmental Quality  
P.O. Box 1677  
Oklahoma City, OK 73 10 1-1 677

Dear ????:

The U.S Environmental Protection Agency (EPA) requests your review of the Wilcox Oil Company Source Control Proposed Plan (Plan) and identification of any state Applicable or Relevant and Appropriate Requirements. The EPA requests comments within 30-days of the date of this letter as well as a letter of support for the proposed action.

The key item for which formal comments and/or input are being requested is the draft Plan which has been provided electronically to Oklahoma Department of Environmental Quality staff. The EPA Remedial Project Manager, Ms. Katrina Higgins-Coltrain, has corresponded with her State counterpart, Mr. Todd Downham, by phone and via e-mail in order to provide appropriate materials and to obtain input related to identifying an acceptable source control remedial response action.

Currently, the Wilcox Oil Company Superfund Site (site) is in the remedial investigation and feasibility study phase of the Superfund Process. During the course of the site investigation, source materials defined as material including or containing hazardous substances, pollutants or contaminants that act as a reservoir for migration of contamination to ground water, to surface water, to air, or acts as a source for direct exposure are identified. The Plan identifies seven (7) former tank areas, a separation pit, and the lead additive area as sources to be addressed. The Plan includes the evaluation of three options and is proposing Excavation and Offsite Disposal for the nine (9) identified source areas. The total estimated volume of source material is approximately 34,622 cubic yards at an estimated cost of \$5,260,232.

Although a final site investigation and determination of nature and extent of contamination has not been completed, taking appropriate source control actions at sites during the investigation stage of the process is consistent with the NCP and existing EPA guidance. The NCP [40 CFR § 300.430(a)(1)] states, "Remedial actions are to be implemented as soon as site data and information make it possible to do so."

Under Section 121(d)(2)(A) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), the remedial actions must meet any Federal standards, requirements, criteria, or limitations that are determined to be legally applicable or relevant and appropriate requirements (ARARs) as well as any State ARARs that are more stringent than Federal requirements. Please provide the EPA with a list of ARARs as part of your review of the Proposed Plan.

We appreciate the Oklahoma Department of Environmental Quality's cooperation and coordination in addressing the cleanup issues associated with this site. As always, EPA appreciates the dedication of your staff in assisting us to achieve our overall goal of protecting human health and the environment. Should you have additional questions or concerns regarding the site, please contact the Remedial Project Manager, Ms. Katrina Higgins-Coltrain by electronic mail at [coltrain.katrina@epa.gov](mailto:coltrain.katrina@epa.gov) or by phone at (214) 665-8143. Please contact the site attorney, Mr. Marvin Benton by electronic mail at [benton.marvin@epa.gov](mailto:benton.marvin@epa.gov) or by phone at (214) 665-3190 with any legal questions.

Sincerely,

**Carl Edlund, John Meyer or Blake Atkins**